

## EXHIBIT D

**ATTORNEY GENERAL W.A. DREW EDMONDSON - 3/25/05**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA

XCALIBER INTERNATIONAL )  
LIMITED, LLC, and KT&G CORP., )

Plaintiffs, )

-vs- )

No. 04-CV-922EA(C)

W.A. DREW EDMONDSON, in his )  
official capacity as Attorney )  
General, State of Oklahoma, )

Defendant. )

**COPY**

\* \* \* \* \*

**DEPOSITION OF ATTORNEY GENERAL W.A. DREW EDMONDSON**

TAKEN ON BEHALF OF THE PLAINTIFFS

IN OKLAHOMA CITY, OKLAHOMA

ON MARCH 25, 2005

\* \* \* \* \*

**REPORTED BY: BETH ANN KIMREY, CSR, RPR-CP**

**STEVE MEADOR & ASSOCIATES  
318 N.W. 13TH STREET  
OKLAHOMA CITY, OKLAHOMA 73103  
(405) 232-4114 \* 1-800-385-4114**

**EXHIBIT**

**D**

**ATTORNEY GENERAL W.A. DREW EDMONDSON - 3/25/05****APPEARANCES:**

**MR. BRUCE W. FREEMAN**, Attorney at Law, of the firm **CONNER & WINTERS**, 3700 First Place Tower, 15 East Fifth Street, Tulsa, Oklahoma 74103-4344, (918)586-8553, appearing on behalf of the **PLAINTIFFS**.

**MR. PETER LEVIN**, Economic Counsel, Tobacco Project, of the **NATIONAL ASSOCIATION OF ATTORNEYS GENERAL**, 750 First Street, N.E., Suite 1100, Washington, D.C. 20002, (202)326-6041, appearing on behalf of the **DEFENDANT**.

**MR. MARK LAWTON JONES**, Assistant Attorney General, of the **OFFICE OF ATTORNEY GENERAL, STATE OF OKLAHOMA**, 4545 North Lincoln Boulevard, Suite 260, Oklahoma City, Oklahoma 73105, (405)521-4274, appearing on behalf of the **DEFENDANT**.

**ALSO PRESENT: MR. KEVIN ALTMAN**

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**STEVE MEADOR & ASSOCIATES**  
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S T I P U L A T I O N S

It is hereby stipulated and agreed by and between the parties hereto, through their respective attorneys, that the deposition of ATTORNEY GENERAL W.A. DREW EDMONDSON may be taken on behalf of the PLAINTIFFS on MARCH 25, 2005, in OKLAHOMA CITY, OKLAHOMA, by Beth Ann Kimrey, a Certified Shorthand Reporter, pursuant to agreement and the Federal Rules of Civil Procedure.

It is further stipulated and agreed by and between the parties hereto, through their respective attorneys, that all objections, except as to the form of the question, are reserved until the time of trial, at which time they may be made with the same force and effect as if made at the time of the taking of the deposition.

\* \* \* \* \*

**ATTORNEY GENERAL W.A. DREW EDMONDSON - 3/25/05 121**

**M E M O R A N D U M**

**TO:** MR. MARK LAWTON JONES  
Assistant Attorney General  
OFFICE OF ATTORNEY GENERAL  
STATE OF OKLAHOMA  
4545 NORTH LINCOLN BOULEVARD  
SUITE 260  
OKLAHOMA CITY, OK 73105

**FROM:** BETH ANN KIMREY, CSR, RPR-CP  
318 Northwest 13th Street  
Oklahoma City, Oklahoma 73103

**DATE:** MARCH 31, 2005

**STYLE:** XCALIBER VS. EDMONDSON  
04CV-922EA(C)  
U.S. DIST. COURT, NORTHERN DIST OF OKLA.

**COPY**

Please have **ATTORNEY GENERAL W.A. DREW EDMONDSON** read your copy of his deposition taken on MARCH 25, 2005, in the above-styled case and sign the Original Jurat Page before a notary public. Also, make any needed corrections on the enclosed Original Correction Sheet and not directly on the transcript.

Within 30 days from the date of this letter, please forward the original notarized jurat page and correction sheet to me, Beth Ann Kimrey, at my office, Steve Meador & Assoc, 318 N.W. 13th Street, Oklahoma City, Oklahoma 73102, for dissemination to the attorneys of record in this case.

**STEVE MEADOR & ASSOCIATES  
318 N.W. 13TH STREET  
OKLAHOMA CITY, OKLAHOMA 73103  
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